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July 8, 2002

James L. Colter
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop No. 82
Lester, PA 19113-2090

Re: Grumman Aerospace – Bethpage (NY Site 1-30-003A) &
Naval Weapons Industrial Reserve Plant –
Bethpage (NY Site 1-30-003B) Site
Draft Navy ROD for Operable Unit 2
SFWD 02-50 / NYWS 00-02

Dear Mr. Colter:

We are submitting this letter on behalf of the South Farmingdale Water District (SFWD) and the New York Water Service (NYWS). We have reviewed the draft ROD for Operable Unit 2 prepared by the Navy for the above referenced sites. The NYSDEC indicated at the June 26, 2002 TAC meeting that while they are currently evaluating the legal aspects of the issuance of the draft ROD, all parties were advised that they should submit any comments to the Navy by July 10, 2002, with copies to the NYSDEC.

In reviewing the Navy issued draft ROD and the NYSDEC issued (March 2001) ROD, we are concerned relative to a number of changes in the previously “negotiated” wording. We have highlighted some of these concerns below:

Groundwater Remedial Program

The proposed groundwater remedial program should include a collection of extraction wells that optimizes the effectiveness of the remedial action in removing contaminants in the GM-38 area AND reduces the potential impact of the contaminant plume on downgradient water supply wells. The modeling results verbally presented at the June 26, 2002 TAC meeting indicated little difference to the downgradient wells regardless of whether two or three extraction wells were installed. Our concern is that this conclusion is somewhat biased due to the proposed location of the third extraction well and the slow rate of groundwater travel in the deeper Magothy aquifer. It is our speculation that if a third extraction well were to be installed further south (on Hempstead Turnpike, in the vicinity of Mid-Island Hospital), and if we were looking out a longer period of time (> 30 years), the

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benefit of adding the third extraction well would be more significant to downgradient water suppliers.

Public Water Supply Protection Program

Sections 9, 10, 11 and 12 (pages 30-31) of the Public Water Supply Protection Program in the NYSDEC issued ROD includes the appropriate language that was previously discussed and agreed to by the affected parties. The proposed language in the Navy issued draft ROD differs from that which was previously agreed to and is not acceptable to the SFWD and NYWS. We request that the Navy issued ROD reflect the previously agreed language. Some examples are:

The Navy issued ROD does not address the frequency of sampling and the sampling/analytical costs for the outpost monitoring wells and water supply wells determined to be potentially impacted or impacted by the plume.

It was our understanding that any site contaminant at a concentration of 1 ppb or higher identified in a sample taken from an outpost monitoring well, once confirmed by a second sample, would trigger action on the part of the NYSDEC, the PRPs and water district relative to the implementation of a wellhead treatment system or a comparable alternative measure, as selected by the water supplier. The Navy issued draft ROD indicates the development of trigger values for each well using groundwater modeling data to aid in the determination for the earliest possible date to initiate discussions with the water supplier to address the issue of wellhead treatment.

The Navy issued ROD is not based on the water supplier determining whether a well impacted by the Grumman / Navy groundwater plume should be treated or whether the water supplier should implement an alternative action to treatment.

The Navy issued ROD is also silent on the frequency of conducting treatment system performance evaluations and whether the remedial goals have been met.

Time Period for Treatment

When the Grumman onsite treatment system and the Navy's selected remedy at GM-38 are both operating as designed, they will certainly decrease the concentration of



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contaminants down-gradient of these two sites. However, due to the extent of contamination and the rate of groundwater travel in the deeper aquifers, these two treatment systems alone are not going to eliminate the potential impact on the SFWD and NYWS well fields from this plume. The time frame before these well fields are impacted will vary from plant site to plant site and the time frame during which the well will be impacted will also vary. Consequently, it is premature to determine whether the time frame for treatment should be limited to thirty years. Rather, the time frame considered as required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) should be for a minimum of 30 years.

We appreciate the opportunity to submit these comments and look forward to the Navy incorporating our concerns in the final ROD. I can be reached at 631-756-8000, extension 1140 if you have any questions.

Very truly yours,

HOLZMACHER, McLENDON & MURRELL, P.C.

A handwritten signature in black ink, appearing to read 'Gary E. Loesch', written over a horizontal line.

Gary E. Loesch, P.E.

cc: Board of Commissioners – SFWD
Vincent A. Bohn, Jr., Vice President
Superintendent Al Licci
Matthew Snyder
Joseph Trotta
Steven M. Scharf, P.E., NYSDEC